

EXHIBIT 1 TO ORDER

Stipulation

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Remaining Debtors.

MICHAEL GOLDBERG, in his capacity as
Liquidating Trustee of the WOODBRIDGE
LIQUIDATION TRUST,

Plaintiff,

vs.

KENNETH HALBERT,

Defendant.

Chapter 11

Case No. 17-12560 (JKS)

(Jointly Administered)

Adversary Proceeding
No. 19-51027 (JKS)

**STIPULATION EXTENDING DEADLINES TO RESPOND TO PLAINTIFF'S
MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

Michael Goldberg (the "Plaintiff"), in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust has agreed, subject to this Court's approval, to defendant Kenneth Halbert (the "Defendant," and together with Plaintiff, the "Parties") request to extend the time to respond to the *Plaintiff's Motion for Leave to File Amended Complaint* [Adv. Pro. D.I. 53] (the "Motion"). Additionally, in connection with Defendant's request for additional time to respond to the Motion, Defendant has agreed to extend Plaintiff's time to file its reply to the Defendant's response. In support hereof, the Parties state as follows:

1. The Plaintiff filed the Motion on July 12, 2021. Defendant has requested, and

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors' mailing address is 14140 Ventura Boulevard, #302, Sherman Oaks, California 91423.

Plaintiff has agreed to extend the Defendant's time to respond to the Motion to August 2, 2021.

2. Defendant has agreed to extend Plaintiff's time to file its reply to Defendant's response to the Motion to August 16, 2021.
3. The Parties' entry into this Stipulation shall be without prejudice to the ability of the Parties to seek further extension of the deadlines set forth herein.

Dated: July 22, 2021

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Dated: July 23, 2021
Wilmington, Delaware

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